From: Len Rubin
To: Dallesandro Angela
Subject: RE: North Palm Beach Police Public Records Request
Date: Thursday, September 26, 2019 11:26:08 AM

Under Florida public records law, there is no exemption for names, e-mail addresses and contact information for employees of a private company (who do not fall into one of the recognized statutory exemptions, such as law enforcement officers, firefighters, etc.). If any of the company's employees do fall within one of the protected categories, they will need to submit a written request to keep such information exempt; however, the exemption generally only applies to home addresses, telephone numbers and dates of birth (not names or e-mail addresses).

Please advise ring.com that the Village cannot legally redact the names of its employees and the employees' contact information. While federal law may allow for the weighing of the public interest versus the privacy of the employees, Florida law does not. In fact, an individual's reason for requesting a public record is irrelevant/immaterial. The scope of the Florida Public Records Law is very broad, and **every** e-mail sent to a public entity in Florida is generally a public record absent a specific statutory exemption.

Len

Leonard G. Rubin, Esquire
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PLEASE NOTE NEW E-MAIL ADDRESS: Len@LGRubinPA.com

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-----Original Message-----
From: Dallesandro Angela
Sent: Wednesday, September 25, 2019 4:54 PM

To: Len Rubin <len@lgrubinpa.com>
Subject: FW: North Palm Beach Police Public Records Request

Len,

Please see comments below.

-----Original Message-----
From: Pearson Louis
Sent: Wednesday, September 25, 2019 4:52 PM
To: Dallesandro Angela
Subject: FW: North Palm Beach Police Public Records Request

See below response from Ring

_____
From: Jack Goodfriend [jack.goodfriend@ring.com]
Sent: Wednesday, September 25, 2019 4:43 PM
To: Pearson Louis
Subject: North Palm Beach Police Public Records Request

Thank you for notifying us of the request that you received under Florida's open records law. We write to request that the names, email addresses, and other contact information of Ring employees be redacted from public disclosure.

Ring employees have strong personal privacy interests in their names and contact information. As private employees of a private company, moreover, Ring employees' names and contact information are not a legitimate matter of public concern. Ring employees' interest in the privacy of their contact information thus outweighs any possible public interest in such information. See, e.g., 5 U.S.C. § 552(b)(6) (exempting from disclosure under the federal Freedom of Information Act (FOIA) "personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy"); Associated Press v. Dep't of Justice, 549 F.3d 62, 65 (D.C. Cir. 2008) (noting that a citizen's name and address have "been found to implicate a privacy interest cognizable under the FOIA exemptions").

If you do not intend to redact Ring employees' names and contact information, please let us know so that we can discuss further. If you have any other questions, please feel free to contact us. Thank you for coordinating.

Jack Goodfriend
Associate Corporate Counsel
jack.goodfriend@ring.com<mailto:jack.goodfriend@ring.com>

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